

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA                          )  
  )  
v.    )  
  ) No. 3:14-CR-140  
IREK ILGIZ HAMIDULLIN,                              )  
  )  
Defendant.    )

**PROTECTIVE ORDER FOR NON-CLASSIFIED INFORMATION**

Upon the motion of counsel for Irek Ilgiz Hamidullin and with the agreement of the government, by and through its counsel, it is hereby,

**Protective Order**

ORDERED pursuant to FED. R. CRIM. P. 16(d)(1), that the following protective measures regarding discovery are in place:

1. All copies of the discovery documents or material provided in any format shall be used by the defense solely and exclusively in connection with this case (including case and trial preparation, trial, and any appeals or other related legal proceeding) and for no other purpose.
2. The defense shall not otherwise make the discovery documents or material or information available, by any means (including duplicate copies created by the defense), to any person not working with or assisting the defense in this criminal action. The defense team may, however, show a witness certain documents and statements as necessary during trial preparations.

3. If the defense team needs to remove the discovery documents or material or information from his/her law office for the purpose of trial preparation, including bringing them to the defendant at the place of the defendant's pretrial incarceration, counsel for the defendant shall maintain custody of the documents on his/her person at all times, and shall remove them from his/her person only as much as is necessary to adequately prepare for trial. In this case, counsel for the defendant may provide the defendant with a copy of discovery documents or materials as necessary to prepare for trial or other proceedings in this case. The defendant shall not disseminate those materials and shall return them to his attorneys at the conclusion of the case as described in the next paragraph.
4. Upon request of the government, after termination of this matter, either by way of a plea pursuant to FED. R. CRIM. P. 11 and up through and including any trial or subsequent direct appeals, the defense shall return to the government all discovery documents (including duplicate copies created by the defense) produced by the government.

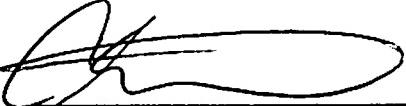
5. Counsel for the defendant is personally responsible for ensuring that the discovery provided in this case is not disseminated in a manner in violation of the procedures set forth in this Order.

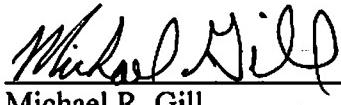
  
\_\_\_\_\_  
/s/  
Henry E. Hudson  
United States District Judge

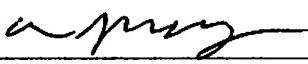
Date: Nov. 4, 2014  
Richmond, Virginia

We ask for this:

DANA J. BOENTE  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
Claire Cardwell  
Counsel for Defendant

By:   
\_\_\_\_\_  
Michael R. Gill  
Assistant United States Attorney

  
\_\_\_\_\_  
Robert J. Wagner  
Counsel for Defendant